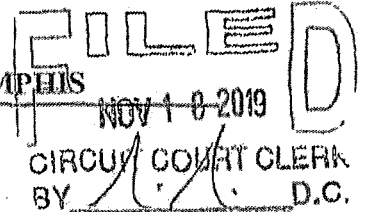


IN THE CIRCUIT COURT OF TENNESSEE
FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS



CRYSTAL BROWN,

Plaintiff,

vs.

NO.: CT-5057-19
DIV IX
JURY DEMANDED

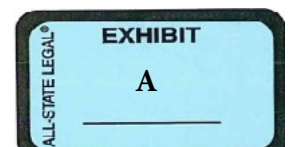
RAINBOW REHABILITATION AND
HEALTHCARE CENTER, LLC.,

Defendant,

COMPLAINT FOR PERSONAL INJURIES

COMES NOW the Plaintiff, Crystal Brown, and sues the Defendant, Rainbow Rehabilitation and Healthcare Center, LLC, for personal injuries sustained on its premises on November 26, 2018 and would show:

1. The Plaintiff, Crystal Brown, is a resident of Stanton, Haywood County, Tennessee;
2. The Defendant, Rainbow Rehabilitation and Healthcare Center, LLC, is a Limited Liability Company organized and formed in the State of Delaware. The Defendant is authorized to do and is currently doing business in the State of Tennessee. The Defendant's physical address is 8119 Memphis-Arlington Road, Bartlett, Shelby County, Tennessee. The Defendant's agent for service of process is Corporation Service Company, 2908 Poston Avenue, Nashville, TN 37203-1312;



3. On or around November 20, 2018, the Defendant was operating its business at 8119 Memphis-Arlington Road, Bartlett, Shelby County, Tennessee. The Defendant had a duty to maintain both individually and through its agents, servants and employees the premises in question;

4. On or around November 20, 2018, the Plaintiff was on said premises visiting a patient;

5. On or around November 20, 2018, the Defendant maintained the premises in question by mopping the floor and failed to provide a warning sign or provide a verbal warning;

6. At the aforementioned time and place, as the Plaintiff was walking into a patient's room at 8119 Memphis-Arlington Road, Bartlett, Shelby County, Tennessee, the Plaintiff slipped on the wet floor and fell down, sustaining severe and permanent injuries;

7. At the time and place, the Defendant, individually and through its employees or agents had a duty to maintain the premises, including the patient rooms, in a reasonably safe condition for persons lawfully on said premises, including the Plaintiff;

8. At the aforementioned time and place, the Defendant, as maintainer of the premises acted with less than reasonable care and was guilty of the following acts of negligence;

- A. Failure to maintain the floors in a safe manner;
- B. Failure to warn the Plaintiff of the slippery and dangerous condition of the floor;
- C. Failure to make a reasonable inspection of the premises when it knew an inspection was necessary to prevent injury to the Plaintiff and others lawfully on the premises;

9. As a direct and proximate result of one or more of the foregoing negligent acts of the Defendant, the Plaintiff sustained severe and permanent injuries to her right knee, right hip, right ankle, and her entire body.

10. As a direct and proximate result of the negligent conduct of the Defendant, the Plaintiff sustained large medical expenses, past and future;

WHEREFORE, the Plaintiff prays for the following relief:

- 1. That service of process issue, requiring the Defendant to answer the allegations contained herein;
- 2. That this case be heard by a jury;
- 3. That she be awarded a judgement not to exceed \$150,000.00
- 4. For general relief.

Respectfully Submitted,


/s/ John E. Dunlap
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